

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re: Chapter 7  
Von Ro Corporation, BKY 13-34910-GFK  
Debtor.

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John R. Stoebner, Trustee, ADV NO. 14-03162  
Plaintiff,  
vs.

Mark J. Mimbach;  
M.J. Mimbach, Inc.;  
Spire Credit Union fka Greater Minnesota Credit Union,  
and John Doe 1-x, Jane Doe 1-x, ABC corporation,  
Defendants

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**NOTICE OF INTENT TO USE EXPERT WITNESS**

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Plaintiff expects that he may need an expert witness on valuation. Such witness may be necessary to determine value of vehicles determined to be property of the estate which are no longer in the possession or control of defendants. Because plaintiff has not yet identified through discovery all such vehicles, if any, that may need to be valued, and because plaintiff does not have funds in the estate sufficient to pay such an expert, plaintiff has not yet retained such a valuation expert.

Plaintiff will promptly disclose the identity of any expert subsequently retained.

Dated: July 10, 2015

LAPP, LIBRA, THOMSON, STOEBNER  
& PUSCH, CHARTERED

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**ATTORNEYS FOR JOHN R. STOEBNER,  
TRUSTEE**